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March 13, 2024

**VIA ECF**

Hon. Victor Marrero  
United States District Judge  
U.S.D.C. for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Urena v. Sonder USA Inc.* - No. 22-CV-7736

Dear Judge Marrero:

We represent Sonder USA Inc. ("Sonder") in the above-referenced matter. By Order dated March 7, 2024, the Court directed the Parties to show cause on or before March 14, 2024 as to "why the Court should not stay its ruling" on Sonder's Motion to Dismiss pending the outcome of anticipated appellate proceedings in *Grant v. Global Aircraft Dispatch, Inc.*, 223 A.D.3d 712 (N.Y. App. Div. 2d Dep't 2024). (ECF No. 42).

We write jointly with Counsel to Plaintiff to request a one-week extension for the Parties to submit their positions on this issue. The Parties intend to explore settlement during this extension, and if the Parties believe further settlement discussions would be warranted, the Parties will submit a request for a stay pending the outcome of these negotiations. This is the Parties' first request for an extension of this deadline.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Brian D. Murphy

Brian D. Murphy  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4887-0629-0349.1

Cc: Counsel for All Parties